

February 16, 2016

Via Electronic Filing

Mr. Gary Shinnars
Executive Secretary
National Labor Relations Board
1099 14th Street, N.W.
Washington, D.C. 20570-0001

Re: Alaris Health at Castle Hill, Case Nos.: 22-CA-125034, 125866, 140619

Dear Mr. Shinnars:

Alaris Health at Castle Hill respectfully request a sixty-day extension of time to file exceptions to the Administrative Law Judge's decision together with a brief in support of said exceptions. Exceptions and briefs are currently due on Wednesday, March 2, 2016.

We received the ALJ's decision at the beginning of February. A month is simply not enough time for our office to file exceptions and a brief in this matter. This case was tried consecutively with three other cases over a period of 19 days. The 19 volumes of transcripts comprise over 3300 pages. Although we do not have a full accounting of the documents admitted into evidence, we estimate that there are at least 1500 pages of documents. There is also video evidence.

We are a small office with only ten attorneys. David Jasinski, Esq. and I are the only two attorneys from our office who represented Alaris Health at Castle Hill and the other respondents in these cases. I will be out of the office beginning February 26th and will not be returning until March 6th. Mr. Jasinski is currently scheduled to appear in Superior Court of New Jersey on Monday, February 22nd for a jury trial that is anticipated to last approximately four weeks. Along with other attorneys in our office, we have been feverishly preparing for that trial. Additionally, the parties continue to meet to negotiate a new collective bargaining agreement.

Simply, it will be extremely difficult to complete exceptions in the time-period allowed. Because Mr. Jasinski will be unavailable for at least four weeks, we request a sixty-day extension.

Thank you for your consideration.

Respectfully submitted,

JASINSKI, P.C.



REBECCA D. WINKELSTEIN